

**Wendy M. Creeden**  
202.408.6479  
wcreeden@sonnenschein.com

1301 K Street, N.W.  
Suite 600, East Tower  
Washington, D.C. 20005-3364  
202.408.6400  
202.408.6399 fax  
www.sonnenschein.com

February 29, 2008

**VIA ELECTRONIC COMMENT FILING SYSTEM**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Suite TW-A325  
Washington, DC 20554

**Re: IP Networked Services, Inc.  
Docket No. 06-36**

Dear Secretary Dortch:

Enclosed for filing in the above-referenced docket, please find the annual CPNI compliance certification of IP Networked Services, Inc., prepared in accordance with section 64.2009(e) of the Federal Communications Commission's rules, 47 C.F.R. § 64.2009(e).

Please direct any questions regarding this filing to the undersigned at 202.408.6479.

Respectfully submitted,



Wendy M. Creeden

Enclosure

cc: FCC Enforcement Bureau, Telecommunications Consumers Division  
Best Copy and Printing, Inc.

**IP Networked Services, Inc.**

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for calendar year 2007.<sup>1</sup>

Name of company covered by this certification: IP Networked Services, Inc.

Form 499 Filer ID: 826434

Name of signatory: James Benson

Title of signatory: President

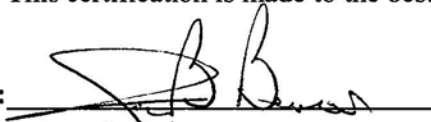
I, James Benson, certify that I am an officer of the company named above ("Company"), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's ("Commission's") Customer Proprietary Network Information ("CPNI") rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

During calendar year 2007, the Company has not received any customer complaints concerning the unauthorized release of CPNI, nor has the Company taken any actions<sup>2</sup> against data brokers. The Company also has no personal experience or knowledge regarding the specific processes pretexters are using to attempt to access CPNI. The steps that the Company are taking to protect CPNI are described in the attached statement that summarizes the Company's internal procedures for compliance with the Commission's CPNI rules.

This certification is made to the best of my knowledge, information and belief.

Signed: \_\_\_\_\_



Dated: \_\_\_\_\_

2/14/08

---

<sup>1</sup> INS is an interconnected Voice-over-Internet Protocol ("VoIP") provider. Compliance with the Commission's CPNI rules for interconnected VoIP providers became effective December 8, 2007.

<sup>2</sup> "Actions" include proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers.

**STATEMENT REGARDING OPERATING PROCEDURES  
GOVERNING USE OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)**

The following statement explains the internal procedures of IP Networked Services, Inc. ("INS" or "Company") to ensure that it is in compliance with the Federal Communications Commission's ("Commission's") CPNI rules.

**1. CPNI Protections**

➤ *Call Detail Records ("CDRs")*

- To access CDR information, a subscriber must submit a written request for the information. The written request must be on the subscriber's letterhead and contain a description of the CDR information requested. The subscriber's written request is required to be verified and approved by INS management. CDR information is not available for access by a subscriber in any other manner.

➤ *Non-CDR CPNI*

- In order to access non-CDR CPNI, the subscriber must contact INS over-the-phone and provide certain account information. Non-CDR CPNI is not available for access on-line, on-site at INS' offices or at any retail locations.

**2. Law Enforcement and Required Disclosures**

➤ *Notification of Account Changes*

- INS notifies a subscriber immediately when an address of record (postal or electronic) is created or changed. This does not include the initial creation of the account. The notification is through a INS-originated voicemail to the telephone number of record, or by mail to the address of record, as to reasonably ensure that the subscriber receives the notification. The notification does not provide the updated information. The Company does not utilize passwords, back-up authentication questions or make available any subscriber on-line accounts.

➤ *CPNI Disclosures to Designated Persons*

- INS will disclose CPNI upon affirmative written request by the subscriber to any person designated by the subscriber. The written request must be on the subscriber's letterhead and contain a description of the CPNI requested. The subscriber's written request is required to be verified and approved by INS management.

➤ *CPNI Breach Notification*

- Within 7 days of a reasonable determination of breach (*i.e.*, CPNI disclosed to a third party without customer authorization), INS will notify the US Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI") of the breach via the central reporting facility [www.fcc.gov/eb/cpni](http://www.fcc.gov/eb/cpni).
- After 7 days of USSS and FBI notice, if INS has not received written direction from the USSS or the FBI, INS will notify the subscriber of the breach, unless the USSS and the FBI have extend the period for such notice.
- For 2 years following USS and FBI notice, INS will maintain a record of (1) discovered breaches; (2) notifications to the USSS and the FBI; (3) USSS and FBI responses; (4) dates breaches discovered; (5) dates INS notified the USSS and the FBI; (6) details of CPNI breached; and (7) circumstances of breaches.

### 3. CPNI Permitted Uses

#### ➤ *Service Provision and Billing*

- INS permits the use and disclosure of, and access to CPNI, either directly or indirectly through its agent, to initiate, render, bill, and collect for its interconnected VoIP services.

#### ➤ *Protection of Rights, Property or Users*

- INS permits the use and disclosure of, and access to CPNI, either directly or indirectly through its agent, to protect the rights or property of the service provider, or to protect users of those services and other service providers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

#### ➤ *Telemarketing, Referral or Administrative Services*

- INS permits the use and disclosure of, and access to CPNI, either directly or indirectly through its agent, to provide any inbound telemarketing, referral, or administrative services to the subscriber for the duration of the call, if such call was initiated by the subscriber and the subscriber approves of the use of such CPNI to provide such service.

#### ➤ *Provision of CPE and Other Non-Telecom Services*

- INS permits the use and disclosure of, and access to CPNI for purpose of providing customer premises equipment (“CPE”) and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, protocol conversion, provision of inside wiring, installation, maintenance, repair services, and to market services formerly known as adjunct services, such as, but not limited to, speed dialing, computer provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding and certain Centrex features.

### 4. CPNI Marketing Uses

#### ➤ *Dedicated Account Representatives*

The marketing of any additional INS or affiliate services to a subscriber is only conducted by the subscriber’s dedicated account representative. No other customer service representatives are allowed to market any additional INS or affiliate services to subscribers.

- **Total Service Approach.** Dedicated account representatives are permitted to use, disclose, and access CPNI for the purpose of marketing service offerings among the categories of service to which INS’ subscriber already subscribes without obtaining the subscriber’s approval.
- **Marketing Outside of the Total Service Approach.** Dedicated account representatives are required to obtain the subscriber’s approval prior to marketing service offerings outside of the categories of service to which the subscriber already subscribes. The dedicated account representative is permitted to use oral notice to obtain limited, one time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call. Dedicated account representatives are not permitted to market any INS or affiliate services to subscribers via postal or electronic mail without the specific approval of INS management.

#### ➤ *Affiliates and Third Parties*

- INS does not share the CPNI of a subscriber with any INS affiliate or third party for purposes of marketing any additional services.

## **5. Training, Recordkeeping and Enforcement**

### **➤ *Training***

- INS employees are trained as to the proper protection, uses and treatment of CPNI, including familiarity with the Company's internal CPNI policies and procedures.

### **➤ *Marketing Campaign Records***

- INS maintains a record of sales and marketing campaigns that use CPNI, including any instances when CPNI is disclosed or provided to third parties or when third parties are allowed access to CPNI. The record is required to include a description of each campaign, the specific CPNI that was used in the campaign, what products and services were offered as part of the campaign. Such records are required to be retained for at least 1 year following the sales and marketing campaign.

### **➤ *Outbound Marketing Supervisory Review***

- INS maintains a supervisory review process regarding compliance with the rules for outbound marketing situations and maintains records of compliance for a minimum of 1 year following the supervisory review. Sales personnel are required to obtain supervisory approval of any proposed outbound marketing request for subscriber approval.

### **➤ *Enforcement***

- It is the policy of INS to seek to employ appropriate remedies against those persons violating the Company's internal CPNI policies and procedures. Remedies may include, but are not limited to, financial, legal or disciplinary actions including termination and referrals to law enforcement when appropriate.